

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**UNITED STATES POSTAL SERVICE RESPONSE TO QUESTION 1
OF PRESIDING OFFICER'S INFORMATION REQUEST NO. 7**
(April 27, 2012)

The United States Postal Service files the response of its witness to a question contained in Presiding Officer's Information Request No. 7, dated April 13, 2012, as indicated below:

Witness Neri

-- Question 1

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 7**

1. In response to POIR No. 5, question 11, witness Neri confirmed that, during a shift, employees may work in operations other than the 5 areas included in his analysis. POIR No. 5, question 11 also requests disaggregated workhours for all operations (including those operations excluded from witness Neri's analysis) at facilities identified in library reference USPS-LR-N2012-1/50 during the sampled time period. Witness Neri responded that these data are not available.
 - a. Please explain how long the Postal Service retains workhour data disaggregated by facility, by hour, and by operation.
 - b. Please identify a time period of at least 14 days for which disaggregated workhour data are available.
 - c. Please provide these data for the time period identified in response to (b) of this question.
 - d. Please provide the analysis performed in library references USPS-LR-N2012-1/49 and USPS-LR-N2012-1/50, using the time period identified in response to (b) and the data provided in response to (c) of this question.

RESPONSE:

- a. The Postal Service does not maintain data disaggregated by facility, operation, and hour. The analysis cited in this interrogatory part is derived from raw transactional data that is available for the most recent 7 weeks.
- b. The identified period is March 1, 2012 through March 31, 2012.
- c. Please see USPS Library Reference USPS-LR-N2012-1/NP25.
- d. Please see USPS Library References USPS-LR-N2012-1/89 and 90. Note that the data reflected in these library references are based on machine hourly data, not employee work hours.